

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

J.Y.C.C., et al.,)	
)	
Plaintiffs,)	
)	
v.)	
)	No. 4:15-CV-1704-RWS
Doe Run Resources Corporation, et al.,)	(consolidated)
)	
Defendants.)	

DECLARATION OF PATRICK J. LANCIOTTI

Patrick J. Lanciotti, an attorney admitted to practice law in the United States District Court for the Eastern District of Missouri, declare pursuant to 28 U.S.C. § 1746 the following:

1. I am an associate of Napoli Shkolnik PLLC, attorneys for Plaintiffs. As such, I am fully familiar with this matter based upon a review of the file maintained in my office.

2. I submit this Declaration in opposition to Defendants Marvin K. Kaiser, Theodore P. Fox III, Jerry Pyatt, Jeffrey L. Zelms, The Doe Run Resources Corporation, DR Acquisition Corp., The Renco Group, Inc., Renco Holdings, Inc., and Ira L. Rennert (collectively “Defendants”) Motion to Show Cause, Dkt. No. 423 (the “Motion”).

3. Annexed hereto as **Exhibit A** is a true and correct copy of a letter dated December 9, 2020 from Patrick J. Lanciotti, Esq. to Geoffrey M. Drake, Esq, disclosing the production of 99 Plaintiff Profile Sheet (“PPS”) subject to Defendants’ Motion.

4. Annexed hereto as **Exhibit B** is a true and correct copy of a letter dated December 10, 2020 from Patrick J. Lanciotti, Esq. to Geoffrey M. Drake, Esq., disclosing the production of an additional 4 PPS subject to Defendants’ Motion.

5. Annexed hereto as **Exhibit C** is a true and correct copy of the Affidavit of Francisco R. Rodriguez dated December 10, 2020.

6. Annexed hereto as **Exhibit D** is a true and correct copy of the Affidavit of Liliana Camarena Cuyubamba dated December 10, 2020.


7. Annexed hereto as **Exhibit E** is a true and correct copy of a transcript excerpt from the November 13, 2020 Status Conference.

8. Annexed hereto as **Exhibit F** is a true and correct copy of the July 15, 2015 Order in the case style *A.O.A., et al., v. Doe Run Resources Corp., et al.*, 4:11-cv-44-CDP (Dkt. No. 316).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct

Respectfully submitted,

Executed on December 10, 2020



Patrick J. Lanciotti, Esq.